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March 2, 2016

VIA ECF

Residential Capital, LLC
1100 Virginia Dr.
Ft. Washington, Pennsylvania, 19034
Attn: Melody Wright

Office of the United States Trustee
33 Whitehall Street, 21st Floor
New York, New York 10004
Attn: Brian Masumoto, Esq. and
Michael Driscoll, Esq.

Morrison & Foerster LLP
1290 Avenue of the Americas
New York, New York 10104
Attn: Norman S. Rosenbaum
James Newton, and
Erica J. Richards

Kramer Levin, Naftalis & Frankel LLP
Counsel for the Committee
1177 Avenue of the Americas
New York, New York 10036
Attn: Elise Frejka and Douglas Manna

VIA FIRST CLASS MAIL

John Wishman, Jr.
Mary Wishman
6425 Engel Dr.
Hamburg, NY 14075

Edward J. Snyder, Esq.
Snyder Law Office
3976 Seneca Street
West Seneca, New York 14224

In Re: Residential Capital, LLC
Bankruptcy Court Case No.: 12-12020-mg
Supreme Court Index No.: 603629/2011
Property: 6425 Engel Dr., Hamburg, NY 14075

To Whom It May Concern:

This office represents the interest of Wilmington Savings Fund Society, FSB, doing business as Christiana Trust, not in its individual capacity, but solely as trustee for BCAT 2015-13BTT, first lien holder and Plaintiff in the above reference matters.

THE PURPOSE OF THIS COMMUNICATION IS TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE
TO THE EXTENT YOUR OBLIGATION HAS BEEN DISCHARGED OR IS SUBJECT TO AN AUTOMATIC STAY OF BANKRUPTCY ORDER UNDER TITLE 11 OF THE UNITED STATES CODE, THIS NOTICE IS FOR COMPLIANCE AND INFORMATIONAL PURPOSES ONLY AND DOES NOT CONSTITUTE A DEMAND FOR PAYMENT OR AN ATTEMPT TO COLLECT ANY SUCH OBLIGATION. RATHER, IT IS A STEP IN THE ENFORCEMENT OF A MORTGAGE LIEN AGAINST YOUR PROPERTY.

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Syracuse Office 136 E. Genesee Street, Suite 2 | Baldwinsville, NY 13027 | Tel (315) 422-3030 | eFax (315) 422-4554

Please accept this letter as a formal Written Request to lift the stay as it pertains to 6425 Engel Dr., Hamburg, NY 14075, the subject property.

Enclosed please find the following:

- Senior Lien Stay Relief Questionnaire ("Questionnaire")
- Exhibit A - Title Search
- Exhibit B - Broker Price Opinion (BPO)
- Exhibit C - Total Amount Due Calculation
 - This figure cannot be relied upon as a "Payoff" quotation.
- Exhibit D - Foreclosure Pleadings

As you can see from the Questionnaire and Exhibits, there is no equity in the property. Thus, this office formally requests that a Stipulation and Order Pursuant to 11 U.S.C. § 362(d) Modifying the Automatic Stay Imposed by 11 U.S.C. § 362(a).

If you have any questions, please do not hesitate to contact this office.

Sincerely,

Knuckles, Komosinski & Elliott, LLP
Attorneys for Wilmington Savings Fund
Society, FSB, doing business as Christiana
Trust, not in its individual capacity, but
solely as trustee for BCAT 2015-13BTT

By: 

Mark R. Knuckles, ESQ.